

July 6, 2017

James Biggins, General Counsel
Executive Secretary for the Hearing
Defense Nuclear Facilities Safety Board

By email to: hearing@dnfsb.gov

Re: Public Comments about the Safety Posture of the Plutonium Facility at Los Alamos National Laboratory

Dear Mr. Biggins:

While DNFSB's recommendations are well-intentioned and technically sound, the overriding problem is that of a failed Department of Energy safety culture. It extends throughout all DOE weapons laboratories. While it is not the DNFSB task to discuss the political aspects of continuing pit production at Los Alamos National Laboratories, the citizens of New Mexico are in staunch opposition to further use of LANL for construction of weapons of mass destruction. The poisoning of the air, soil and water from past LANL dumping operations has resulted in a Chromium VI plume and contamination of the Rio Grande with radionuclides including Plutonium. Citizen Action's position is that the pit production operations at LANL should be halted permanently. LANL is an unsafe location.

There is a long and dismal history of DNFSB making safety recommendations to LANL about criticality, seismic protection, nuclear wastes and administrative non-compliance and the dilatory or non-implementation of them. DNFSB is still making recommendations that were not carried out a decade ago by LANL. The PF-4 building has been known to be unsafe from a seismic perspective since at least 2008.

The testimony of Kim Lebak to the DNFSB is notable for its failure to address what the earthquake potential is for LANL. One cannot claim that safety upgrades meet a seismic threat when the size of the threat remains unknown. LANL has done poor quality work in investigating the potential for seismic ground rupture at the PF-4 site. No network of seismometers to gather seismic data is in place at LANL. Computer models are utilized without gathering actual hard data to make accurate models. The potential for synchronous ruptures of the fault system at LANL is not considered.

The DNFSB laundry list of problems at LANL PF-4 coupled with inadequate funding add up to a facility that is unsafe for workers and the public. Some examples from DNFSB (*Opportunities for Risk Reduction* 2015):

- No active confinement ventilation system.
- No seismically qualified fire suppression system,

- Funding uncertainties exist and completion is optimistically 5–10 years away
- Board disagreement with the LANL accident scenario that assumes that the PF-4 structure will not collapse due to a design basis earthquake.
- Gloveboxes and floor locations that are the most vulnerable to impacts from seismic events and fires hold nearly 80 percent of the Material at Risk.
- Incomplete nuclear criticality safety evaluations, and incomplete seismic anchoring and supporting engineering documentation for the safes.
- LANL waste staging areas are approaching their capacity and Area G remains unable to receive newly-generated waste due to a number of significant safety basis issues

Respectfully,

David B. McCoy, Executive Director
Citizen Action New Mexico
PO Box 4276
Albuquerque, NM 87196